

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

GENEVIEVE TAMBRONI, *et al.*, individually
and on behalf of all others similarly situated,

Plaintiffs,

v.

WELLNOW URGENT CARE, P.C.,
ADMI CORP d/b/a TAG – THE ASPEN
GROUP, and PHYSICIANS
IMMEDIATE CARE LLC,

Defendants.

Case No. 1:24-cv-01595

(Applies to All Actions)

PLAINTIFFS NOTICE OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE

Representative Plaintiffs Genevieve Tambroni, John Lattimore (as parent for minor children S.L. and V.L), Ella Williams, James Beach, Caitlin McDaniel and Claudine King pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i), hereby voluntarily dismiss all claims against Defendants WellNow Urgent Care, P.C., ADMI Corp. d/b/a TAG - The Aspen Group, Physicians Immediate Care LLC and Aspen Dental Management, Inc. without prejudice.

Dated: January 10, 2025

Respectfully Submitted,

/s/David S. Almeida

David S. Almeida

Britany A. Kabakov

ALMEIDA LAW GROUP LLC

849 W. Webster Avenue

Chicago, Illinois 60614

Telephone: (312) 576-3024

david@almeidalawgroup.com

britany@almeidalawgroup.com

Laura Van Note, Esq. (CA S.B. #310160)

COLE & VAN NOTE

555 12th Street, Suite 2100

Oakland, California 94607

Telephone: (510) 891-9800
lvn@colevannote.com

Brandon M. Wise, Esq. (IL S.B. Bar # 6319580)
PEIFFER WOLF CARR
KANE CONWAY & WISE, LLP
818 Lafayette Ave., Floor 2
St. Louis, MO 63104
Telephone: 314-833-4825
bwise@peifferwolf.com

Daniel Srourian, Esq. (SBN 285678) *
SROURIAN LAW FIRM, P.C.
3435 Wilshire Blvd., Suite 1710
Los Angeles, California 90010
Telephone: 213.474.3800
daniel@slfla.com

Kevin Laukaitis, Esq.**
LAUKAITIS LAW LLC
954 Avenida Ponce De Leon
Suite 205, #10518
San Juan, PR 00907
Telephone: (215) 789-4462
klaukaitis@laukaitislaw.com

**Pro hac vice*

*** Pro hac vice anticipated*

Attorneys for Representative Plaintiffs & the Class

CERTIFICATE OF SERVICE

I certify that on January 10, 2025, I electronically served the foregoing on all counsel of record via the Court's CM/ECF system.

/s/ David S. Almeida
David S. Almeida